

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

White Forest Resources, Inc., *et al.*

Debtors.¹

Chapter 7

Case No. 25-10195 (TMH)

(Jointly Administered)

**STIPULATION AND ORDER FOR IMMEDIATE REJECTION OF
MASTER EQUITY LEASE AGREEMENT WITH ENTERPRISE FM TRUST
AND ENTERPRISE FLEET MANAGEMENT, INC. AND TO MODIFY THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362**

This stipulation and order (the “**Stipulation**”) is entered into by and among Jeoffrey L. Burch as chapter 7 trustee (the “**Trustee**”) for the estates (the “Estates”) of White Forest Resources, Inc. and its related debtors in the above-captioned cases (collectively, the “**Debtors**”), and Enterprise FM Trust and Enterprise Fleet Management, Inc. (together, “**Enterprise**”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on February 7, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “**Petition Date**”).

WHEREAS, on August 25, 2025 (the “**Conversion Date**”), the Court entered the *Order (I) Converting These Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications, and (III) Granting Related Relief*. The Trustee was appointed as the chapter 7 trustee for the Debtors’ estates.

WHEREAS, prior to the Petition Date, the Debtors entered into the *Master Equity Lease Agreement* dated January 26, 2017 with Enterprise (the “**Lease Agreement**”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: White Forest Resources, Inc. (3764); Xinerger Corp. (3865); Xinerger of West Virginia Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors’ service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

WHEREAS, as of the Conversion Date, pursuant to the Lease Agreement, the Debtors were leasing the vehicles listed in the attached **Exhibit 1** pursuant to the terms of the Lease Agreement (the “**Vehicles**”).

WHEREAS, pursuant to the terms of the Lease Agreement, and subject to a formula set forth therein, the Debtors had the right to receive certain funds back from Enterprise (the “**Equity Interest**”) following the return and retrieval the leased Vehicles, subject to a number of variables, including, *inter alia*, the condition and mileage of each Vehicle and the sales price realized by Enterprise.

WHEREAS, the Debtors ceased operating on the Conversion Date, and as a result, the Trustee does not require the Vehicles to administer the Estates.

WHEREAS, to reduce the potential administrative expenses for the Estates, the Trustee seeks to reject the Lease Agreement.

WHEREAS, the Parties have agreed to a modification of the automatic stay under section 362 of the Bankruptcy Code (to the extent necessary) so that Enterprise can pick up and liquidate the Vehicles.

ACCORDINGLY, THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. The Lease Agreement shall be deemed rejected pursuant to 11 U.S.C. § 365 as of the Conversion Date.
2. To the extent required, the automatic stay under 11 U.S.C. § 362 is modified to permit Enterprise to pick up and sell the Vehicles in a commercially reasonable manner.
3. Enterprise shall provide the Trustee with an accounting of the costs of disposition and funds obtained from the sale of the Vehicles.
4. Should the sale of the Vehicles result in a positive Equity Interest, and after the application of any unpaid receivables or other losses under the Lease Agreement against such Equity Payment, Enterprise shall remit (the “Payment”) to the Estates the Equity Interest as soon as practicable and in accordance with the terms and condition of the Lease Agreement, in any case within forty-five (45) days after the sale of all Vehicles.
5. Such Payment, however, shall be subject to a holdback of no more than \$10,000 for delayed charges under the Lease Agreement (the “**Holdback**”) for up to an additional ninety (90) days, at which time any unpaid amount of the Holdback shall be remitted to the Estates.

6. If the sale of the Vehicles results in a negative Equity Interest, Enterprise may file a proof of claim on account of its losses under the Lease Agreement within forty-five (45) days after the sale of all Vehicles.

7. The Court shall retain sole and exclusive jurisdiction over all aspects of this Stipulation, including its interpretation, implementation, and any resolution of disputes or controversies arising therefrom.

REVIEWED AND APPROVED:

COZEN O'CONNOR

/s/ Simon E. Fraser

Simon E. Fraser, Esq. (No. 5335)
1201 N. Market St., Ste. 1001
Wilmington, DE 19801
Telephone: (302) 295-2000
Email: sfraser@cozen.com

Counsel for the Trustee

COOCH AND TAYLOR, P.A

/s/ R. Grant Dick IV

R. Grant Dick IV (Del. No. 5123)
Kevin D. Levitsky (Del. No. 7228)
1000 N. West Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 984-3800
Facsimile: (302) 984-3939
Email: gdick@coochtaylor.com
klevitsky@coochtaylor.com

*Counsel for Enterprise Fleet
Management, Inc. and Enterprise FM
Trust*

and

FOLEY & LARDNER LLP

Geoff Goodman
Illinois Bar No. 6272297
ggoodman@foley.com
321 North Clark Streety, Suite 2800
Chicago, IL 60654
Tel. 321-832-4500
*Counsel for Enterprise FM Trust and
Fleet Management, Inc.*

Exhibit 1


FLEET MANAGEMENT

Vehicle	Master Cust N	Master Cust Name	VIN	Year	Make	Model	Series	Calculated Mileage Date	Delivery Date	License State	License Number	License Exp. Date	Lease Type	Lease Term	Contract Mileage	Months In Service	Delivered Price	Street Address	Street Address	Garage City	Garage State	Garage County	Lease End Date	Zip Postal	Garage Country
27GSCF	572626	White Forest Resources, Inc.	3C6UR5CJ4RG250799	2024	RAM	2500	Tradesmar	5/20/2024	5/20/2024	WV	408209A	4/1/2026	Equity II	48	100000	16	55402.39	1295 Ashford Hill Rd	ASHFORD WV	BOONE		5/31/2028	25009	USA	
27GSPJ	572626	White Forest Resources, Inc.	3C6UR5CJ9RG250801	2024	RAM	2500	Tradesmar	4/23/2024	4/23/2024	WV	408211A	4/1/2026	Equity II	48	100000	17	45021.12	1295 Ashford Hill Rd	ASHFORD WV	BOONE		4/30/2028	25009	USA	
27GSPL	572626	White Forest Resources, Inc.	3C6UR5CJ0RG249424	2024	RAM	2500	Tradesmar	5/1/2024	5/1/2024	WV	408206A	4/1/2026	Equity II	48	100000	17	55157.98	1295 Ashford Hill Rd	ASHFORD WV	BOONE		4/30/2028	25009	USA	
27GSPN	572626	White Forest Resources, Inc.	3C6UR5CJ0RG250802	2024	RAM	2500	Tradesmar	4/23/2024	4/23/2024	WV	408210A	4/1/2026	Equity II	48	100000	17	45048.49	1295 Ashford Hill Rd	ASHFORD WV	BOONE		4/30/2028	25009	USA	
27GSPR	572626	White Forest Resources, Inc.	3C6UR5CJ2RG249425	2024	RAM	2500	Tradesmar	7/2/2024	7/2/2024	WV	408208A	4/1/2026	Equity II	48	100000	14	45960.79	1295 Ashford Hill Rd	ASHFORD WV	BOONE		7/31/2028	25009	USA	
253VD6	572626	White Forest Resources, Inc.	3C6UR5CJ6NG155364	2022	RAM	2500	Tradesmar	11/18/2021	11/18/2021	WV	DZU157	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
253VD7	572626	White Forest Resources, Inc.	3C6UR5CJ8NG155365	2022	RAM	2500	Tradesmar	11/18/2021	11/18/2021	WV	DZU183	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
253VD8	572626	White Forest Resources, Inc.	3C6UR5CJXNG155366	2022	RAM	2500	Tradesmar	11/30/2021	11/30/2021	WV	DZU177	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
253VDB	572626	White Forest Resources, Inc.	3C6UR5CJ2NG155359	2022	RAM	2500	Tradesmar	11/18/2021	11/18/2021	WV	DZU156	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
253VDC	572626	White Forest Resources, Inc.	3C6UR5CJ5NG155355	2022	RAM	2500	Tradesmar	12/2/2021	12/2/2021	WV	DZU194	12/1/2025	Equity Lease - Fixed	48	100000	45	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		12/31/2025	25009	USA	
253VDD	572626	White Forest Resources, Inc.	3C6UR5CJ1NG155367	2022	RAM	2500	Tradesmar	11/30/2021	11/30/2021	WV	DZU176	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
253VDF	572626	White Forest Resources, Inc.	3C6UR5CJ3NG155368	2022	RAM	2500	Tradesmar	12/2/2021	12/2/2021	WV	DZU195	12/1/2025	Equity Lease - Fixed	48	100000	45	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		12/31/2025	25009	USA	
253VDG	572626	White Forest Resources, Inc.	3C6UR5CJ5NG155369	2022	RAM	2500	Tradesmar	11/30/2021	11/30/2021	WV	DZU184	12/1/2025	Equity Lease - Fixed	48	100000	46	42263.00	1295 ASHFORD HILL	ASHFORD WV	BOONE		11/30/2025	25009	USA	
26JS9Z	572626	White Forest Resources, Inc.	1FTFW1E53NKE68237	2022	Ford	F-150	Lariat 4x4 S	12/16/2022	12/16/2022	WV	35X529	3/1/2026	Equity Lease - Fixed	60	100000	33	56770.72	1295 ASHFORD HILL	ASHFORD WV	BOONE		12/31/2027	25009	USA	
26KTVC	572626	White Forest Resources, Inc.	1FTFW1E51NKE68429	2022	Ford	F-150	Lariat 4x4 S	2/8/2023	2/8/2023	WV	1XH718	1/1/2026	Equity Lease - Fixed	60	100000	31	51180.29	1295 ASHFORD HILL	ASHFORD WV	BOONE		2/29/2028	25009	USA	
26KTW6	572626	White Forest Resources, Inc.	1FTFW1E58NKE68122	2022	Ford	F-150	Lariat 4x4 S	3/24/2023	3/24/2023	WV	49D466	4/1/2026	Equity Lease - Fixed	60	100000	30	56569.76	1295 ASHFORD HILL	ASHFORD WV	BOONE		3/31/2028	25009	USA	
26KTWB	572626	White Forest Resources, Inc.	1FTFW1E59NKE68680	2022	Ford	F-150	Lariat 4x4 S	2/28/2023	2/28/2023	WV	35X549	3/1/2026	Equity Lease - Fixed	60	100000	31	56372.31	1295 ASHFORD HILL	ASHFORD WV	BOONE		2/29/2028	25009	USA	
26LDNC	572626	White Forest Resources, Inc.	1FMJU1RT6NEA46594	2022	Ford	Expedition	Timberline	12/30/2022	12/30/2022	WV	2ZC444	2/1/2026	Equity Lease - Fixed	60	100000	33	68419.05	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2027	25009-976	USA	
23TX9R	572626	White Forest Resources, Inc.	1C6SRFGT9MN815198	2021	RAM	1500	Tradesmar	7/15/2021	7/15/2021	WV	07Y483	10/1/2026	Equity Lease - Fixed	59	98333	50	34069.00	1295 Ashford Hill Rd	ASHFORD WV	BOONE		6/30/2026	25009	USA	
233SLX	572626	White Forest Resources, Inc.	1FT7W2B60KEF17119	2019	Ford	F-250	XL 4x4 SD	6/20/2019	6/20/2019	WV	75A977	7/1/2026	Equity Lease - Fixed	78	170625	75	31933.57	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
233SML	572626	White Forest Resources, Inc.	1FT7W2B67KEF17120	2019	Ford	F-250	XL 4x4 SD	6/20/2019	6/20/2019	WV	75A976	7/1/2026	Equity Lease - Fixed	78	130000	75	32196.07	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22SBZZ	572626	White Forest Resources, Inc.	1GC2KUEG6JZ106322	2018	Chevrolet	Silverado 2WT	4x4 Cr	5/30/2018	5/30/2018	WV	74A313	7/1/2026	Equity Lease - Fixed	96	128000	88	31583.12	1295 Ashford Hill Rd	ASHFORD WV	BOONE		5/31/2026	25009	USA	
22DH5F	572626	White Forest Resources, Inc.	1GC1KUEG1HF126419	2017	Chevrolet	Silverado 2WT	4x4 Cr	2/25/2019	1/31/2017	WV	42G477	4/1/2026	Equity Lease - Fixed	107	150620	104	34749.22	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22DH88	572626	White Forest Resources, Inc.	1GC1KUEG9HF101817	2017	Chevrolet	Silverado 2WT	4x4 Cr	1/31/2017	1/31/2017	WV	42G478	4/1/2026	Equity Lease - Fixed	107	150620	104	35222.44	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22DH92	572626	White Forest Resources, Inc.	1GC1KUEG1HF109667	2017	Chevrolet	Silverado 2WT	4x4 Cr	2/8/2017	2/8/2017	WV	3YX567	3/1/2026	Equity Lease - Fixed	106	151518	103	32954.40	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22DH9L	572626	White Forest Resources, Inc.	1GC1KUEG8HF106006	2017	Chevrolet	Silverado 2WT	4x4 Cr	2/8/2017	2/8/2017	WV	3YX566	3/1/2026	Equity Lease - Fixed	106	151518	103	33385.50	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22DHCH	572626	White Forest Resources, Inc.	1GC1KUEG2HF114120	2017	Chevrolet	Silverado 2WT	4x4 Cr	2/8/2017	2/8/2017	WV	3YX565	3/1/2026	Equity Lease - Fixed	106	151518	103	33663.60	1295 Ashford Hill Rd	ASHFORD WV	BOONE		12/31/2025	25009	USA	
22HDTM	572626	White Forest Resources, Inc.	1GC1KUEG6HF109051	2017	Chevrolet	Silverado 2WT	4x4 Cr	6/20/2017	6/20/2017	WV	81V338	8/1/2026	Equity Lease - Fixed	108	150003	99	32881.62	1295 Ashford Hill Rd	ASHFORD WV	BOONE		6/30/2026	25009	USA	
22HDTN	572626	White Forest Resources, Inc.	1GC1KUEG9HF209337	2017	Chevrolet	Silverado 2WT	4x4 Cr	6/20/2017	6/20/2017	WV	81V337	8/1/2026	Equity Lease - Fixed	108	150003	99	32490.50	1295 Ashford Hill Rd	ASHFORD WV	BOONE		6/30/2026	25009	USA	
22M4SS	572626	White Forest Resources, Inc.	1GC1KUEG2HF228487	2017	Chevrolet	Silverado 2WT	4x4 Cr	11/9/2017	11/9/2017	WV	DWJ144	12/1/2025	Equity Lease - Fixed	96	128000	94	32885.40	1295 Ashford Hill Rd	ASHFORD WV	BOONE		11/30/2025	25009	USA	